

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

**SCOTT T. BALLOCK,**

Plaintiff,

Case No.: 1:17-CV-52-IMK

v.

JURY TRIAL REQUESTED

**ELLEN RUTH COSTLOW,  
STATE TROOPER MICHAEL KIEF,  
STATE TROOPER RONNIE M. GASKINS,  
and  
STATE TROOPER CHRIS BERRY,**

Defendants.

**PLAINTIFF'S MOTION TO COMPEL DISCOVERY FROM  
STATE TROOPER DEFENDANTS KIEF, GASKINS AND BERRY**

**Exhibit A**

**DOCUMENT PRIVILEGE LOG****Ballock v. Costlow, Kief, Gaskins, and Berry****US District Court of Northern District of West Virginia****Case No. 1:17-CV-52**

<b>Date/Time</b>	<b>Custodian</b>	<b>Description of Document</b>	<b>Bates Numbered</b>	<b>Privilege Asserted</b>
04/11/16 4:33 p.m.	Steptoe & Johnson	Email chain between D. Johnson, M. Kief and Attorney V. Grotendieck	Troopers-PRIV 00001 - Troopers-PRIV 00002	Attorney-Client Privilege
04/22/17 12:11 p.m.	Steptoe & Johnson	Email from E. Costlow to M. Kief re: representation in lawsuit	Troopers-PRIV 00003 - Troopers-PRIV 00005	Work Product
04/24/17 10:24 a.m.	Steptoe & Johnson	Email from E. Costlow to M. Kief & R. Gaskins re: representation in lawsuit	Troopers-PRIV 00006	Work Product
04/24/17 11:28 a.m.	Steptoe & Johnson	Email from E. Costlow to M. Kief re: representation in lawsuit	Troopers-PRIV 00007	Work Product
04/26/17 9:38 p.m.	Steptoe & Johnson	Email from E. Costlow to M. Kief re: allegations in lawsuit	Troopers-PRIV 00008	Work Product
04/27/17 7:28 a.m.	Steptoe & Johnson	Email from E. Costlow to M. Kief & R. Gaskins re: website concerning lawsuit	Troopers-PRIV 00009 - Troopers-PRIV 00010	Work Product
04/27/17 6:55 p.m.	Steptoe & Johnson	Email from E. Costlow to M. Kief re: defense of lawsuit	Troopers-PRIV 00011	Work Product

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<b>Date/Time</b>	<b>Custodian</b>	<b>Description of Document</b>	<b>Bates Numbered</b>	<b>Privilege Asserted</b>
04/28/17 5:31 p.m.	Steptoe & Johnson	Email from E. Costlow to M. Kief re: website concerning lawsuit	Troopers-PRIV 00012	Work Product
04/28/17 5:38 p.m.	Steptoe & Johnson	Email from E. Costlow to M. Kief re: website concerning lawsuit	Troopers-PRIV 00013 - Troopers-PRIV 00016	Work Product
04/28/17 5:40 p.m.	Steptoe & Johnson	Email from E. Costlow to M. Kief re: allegations in lawsuit	Troopers-PRIV 00017	Work Product
04/28/17 6:34 p.m.	Steptoe & Johnson	Email from E. Costlow to M. Kief re: allegations in lawsuit	Troopers-PRIV 00018	Work Product
06/21/17 7L29 p.m.	Steptoe & Johnson	Email from E. Costlow to M. Kief re: allegations in lawsuit	Troopers-PRIV 00019	Work Product
07/16/17 8:23 p.m.	Steptoe & Johnson	Email from E. Costlow to M. Kief re: website concerning lawsuit	Troopers-PRIV 00020	Work Product
7/21/17 10:36 a.m.	Steptoe & Johnson	Email from E. Costlow to M. Kief re: lawsuit advice	Troopers-PRIV 00021	Work Product

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<b>Date/Time</b>	<b>Custodian</b>	<b>Description of Document</b>	<b>Bates Numbered</b>	<b>Privilege Asserted</b>
10/11/17 7:24 a.m.	Steptoe & Johnson	Email from E. Costlow to M. Kief re: allegations in lawsuit	Troopers-PRIV 00022	Work Product
02/19/18 1:49 p.m.	Steptoe & Johnson	Email from E. Costlow to M. Kief re: allegations in lawsuit	Troopers-PRIV 00023 - Troopers-PRIV 00024	Work Product
04/25/17 8:34 a.m.	Steptoe & Johnson	Email from Ronnie Gaskins to E. Costlow re: Attorney	Troopers PRIV 00028	Work Product